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April 19, 2018

VIA EMAIL

Sieglinde K. Rath, Esq.  
Storzer & Associates, P.C.  
1025 Connecticut Avenue  
N.W. Suite 1000  
Washington, DC 20036

RE: Valley Chabad v. Borough of Woodcliff Lake  
Docket No.: 2:16-CV-08087-JLL-JAD  
Our File No.: 41034.00106

Dear Sieglinde:

Attached are interrogatory answers from the Borough of Woodcliff Lake and Mayor Rendo. Please call if you have any questions.

Very truly yours,

*Howard B. Mankoff*

Howard B. Mankoff

HBM:ssierra  
Attachments

Valley Chabad, Inc., a New Jersey nonprofit corporation, and Rabbi Dov Drizin,  Plaintiff,  v.  The Borough of Woodcliff Lake, N.J. and Zoning Board of Adjustment of the Borough of Woodcliff Lake, N.J., Carlos Rendo, individually and in his capacity as the Mayor of Woodcliff Lake, and Paul Bechetel, in his official capacity as Property Maintenance Officer of the Borough of Woodcliff Lake,  Defendants.	CASE NO.: 2:16-CV-08087-JLL-JAD  Civil Action  <b>DEFENDANT, CARLOS RENDO, INDIVIDUALLY, OF THE BOROUGH OF WOODCLIFF LAKE ANSWERS TO INTERROGATORIES</b>
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### INTERROGATORIES

1. All parties to this action, their agents, servants, and employees; all persons named in response to discovery demands, the amendments thereto, both formal and informal; former Mayor Goldsmith and former council member Rosenblatt; all members of the Zoning Board, who were members when the Plaintiffs submitted their application for zoning variances; all persons and experts who testified in support of, and against the Plaintiff's application for zoning variances; Zoning Board Counsel, Mr. Princiotta.
2. The defendant objects to the question that the saying is overly broad. Without waiving the objection and in an effort to be responsive, various statements were made during the public meetings of the Borough Mayor and Council, since I took office as a councilman in 2012, to present with regards to the Plaintiffs' variance applications. I do not recall each and every statement.
3. I first learned of this in August of 2013.
4. I first learned of this in October 2013, at a Mayor and Council meeting when Councilman Rosenblatt indicated the existence of a contract.
5. To the best of my knowledge I had no communication with the Basketball Association or the Board of Education.

6. Carlos Rendo of 10 Balsam Road, Woodcliff Lake, New Jersey 07677. I was born on February 19, 1964 in Sagua La Grande, Cuba. The last four digits of my Social Security number are 1157.
7. I have no documents in my personal possession.
8. I have none in my personal possession.
9. There was a meeting in August 2013 at the Woodcliff Lake Hilton with Rabbi Dov, Andy Roth and myself. The discussion was a generalized introduction meeting. Galaxy Gardens was briefly discussed, and this is where I became aware of the Rabbi's plans to pursue the purchase of the property.
10. The defendant objects to this question because the question is overly broad. Upon present information and belief, I am not aware of any statements.
11. I have not been convicted of a crime.
12. Yes, Garbur v. Rendo/Dissolution of Legal Practice.
13. I have not contacted the tax assessor and/or the tax collector for the Borough regarding the Subject Property.
14. I have not participated or attended any meetings regarding same other than those indicated and the answer to question of 9.
15. Yes, I was contacted by Rabbi Orenstein with regards to their use/school board issues and I told him to contact the Borough Administrator and Borough Attorney. I believe this to have occurred in early 2016.
16. Other than this law suit, no. With regards to the purchase of this property, the Mayor and Council have had numerous discussions regarding same at open and closed meetings. Further any discussions I may have had with legal counsel regarding the purchase are subject to privilege.
17. I believe the Borough Mayor and Council received a letter from their attorney from the firm of Rothschild.
18. Upon present information and belief, I have no knowledge.
19. Upon present information and belief, I believe the Mayor and Council received a letter by their legal Counsel John Lamb of Beattie Padavano regarding their existence and their intentions.
20. I do not maintain agendas, diaries, calendars or logs.

21. Other than my flyers for the election into office. I will provide whatever ones I may have available from the 2013 campaign for Council and 2014 for Mayor if I am able to locate things.
22. Yes, I have a Facebook account that was started in 2007 for my personal account. I also have an account for Mayor of Woodcliff Lake.
23. I will provide a list of groups that I am a member of.
24. I have had no communication.
25. I have not attended or participated in any meetings.
26. I have not attended or participated in any meetings.
27. I have not attended or participated in any meetings.
28. I have not attended or participated in any meetings.
29. I have not heard of any statements uttered by Borough residents.

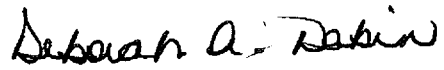
CERTIFICATION

I hereby certify that the foregoing answers to interrogatories are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

C. S. Hendricks, 3/29/2018

Certification to Interrogatory Answers From Plaintiff to Borough of Woodcliff Lake

The interrogatory answers provided by the Borough of Woodcliff Lake are not within the personal knowledge of the signatory to this certification. The answers are provided by consulting with other Borough officials, employees and referring to the documents. In addition, counsel was consulted in regards to questions about legal theories.

A handwritten signature in black ink, reading "Deborah A. Dakin". The signature is written in a cursive style with a horizontal line underneath the name.

Debbie Dakin, Borough Clerk